

**REMARKS**

Claims 1-18 are pending in this application. By this Amendment, claims 1 and 16-18 are amended. No new matter is added. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

**I.      §112, Second Paragraph, Rejection**

The Office Action rejects claim 8 under 35 U.S.C. §112, second paragraph, as having insufficient antecedent basis. Applicants respectfully traverse this rejection. Specifically, Applicants assert that "the plural colors," as recited in claim 8, has sufficient antecedent basis. For example, claim 1 recites "a filter of plural colors" at line 9. Accordingly, Applicants respectfully request that the Examiner withdraw the §112, second paragraph, rejection.

**II.     §103(a) Rejection**

The Office Action rejects claims 1-8 and 10-13 under 35 U.S.C. 103(a) as being unpatentable over Gordon (U.S. Patent No. 6,271,823) in view of Hou (U.S. Patent No. 6,113,810); rejects claims 14-18 under 35 U.S.C. 103(a) as being unpatentable over Gordon in view of Hou and further in view of Comiskey (U.S. Patent No. 6,376,828); and rejects claim 9 under 35 U.S.C. 103(a) as being unpatentable over Gordon in view of Hou and further in view of Shirochi (U.S. Patent No. 5,872,654). Applicants respectfully traverse these rejections.

Specifically, Applicants assert that Gordon, Hou, Comiskey, and Shirochi, individually or in combination, fail to disclose an image display medium including at least a display substrate having a first side and a second side, a back substrate, an electrode formed on the first side, a spacer for forming a gap between the display substrate and the back substrate, two kinds of particles differing in color and charging polarity sealed between the display substrate and the back substrate, and a filter of plural colors for transmitting light of a

specific wavelength, wherein the filter is formed on the second side, as recited in independent claim 1, and similarly recited in independent claims 16-18.

In stark contrast, Gordon, in Figure 1a, discloses a transmissive electrophoretic color display including a transmissive window (2), a counter electrode (20), and filter elements (30, 32, 34), wherein the counter electrode and the filter elements are located on the same side of the transmissive window. Accordingly, Gordon fails to disclose an image display medium including at least a display substrate having a first side and a second side, an electrode formed on the first side, and a filter of plural colors for transmitting light of a specific wavelength, wherein the filter is formed on the second side, as recited in claims 1 and 16-18.

Hou merely discloses an electrophoretic display including an anode and a cathode deposited on glass plates, and electrophoretic particles suspended in a fluid medium and disposed between the anode and the cathode. Hou, however, fails to disclose an image display medium including at least a display substrate having a first side and a second side, an electrode formed on the first side, and a filter of plural colors for transmitting light of a specific wavelength, wherein the filter is formed on the second side, as recited in claims 1 and 16-18.

Comiskey merely discloses a nonemissive electronic display including a substrate having a first surface and a second surface, a display media disposed adjacent to the first surface, wherein the display media contains nonemissive display elements having electrically-responsive optical properties. Comiskey, however, fails to disclose an image display medium including at least a display substrate having a first side and a second side, an electrode formed on the first side, and a filter of plural colors for transmitting light of a specific wavelength, wherein the filter is formed on the second side, as recited in claims 1 and 16-18.

Shirochi merely discloses a display device having pixels disposed in a mosaic pattern, and a plurality of optical filter surfaces which are respectively placed between the display

device and the viewer so that both surfaces can be overlapped with each other. Shirochi, however, fails to disclose an image display medium including at least a display substrate having a first side and a second side, an electrode formed on the first side, and a filter of plural colors for transmitting light of a specific wavelength, wherein the filter is formed on the second side, as recited in claims 1 and 16-18.

Accordingly, Applicants assert that that Gordon, Hou, Comiskey, and Shirochi, individually or in combination, fail to disclose an image display medium including at least a display substrate having a first side and a second side, an electrode formed on the first side, and a filter of plural colors for transmitting light of a specific wavelength, wherein the filter is formed on the second side, as recited in independent claims 1 and 16-18.

In accordance with the above remarks, Applicants submit that independent claims 1 and 16-18 define patentable subject matter. Claims 2-15 depend from claim 1, and therefore, also define patentable subject matter. Thus Applicants respectfully request that the Examiner withdraw the §103(a) rejections.

### **III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-18 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Bogdan A. Zinchenko  
Registration No. 57,473

JAO:BAZ/hs

Date: May 4, 2006

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

<b>DEPOSIT ACCOUNT USE AUTHORIZATION</b> Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461
--